

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKAS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**STIPULATION OF
VOLUNTARY DISMISSAL
WITH PREJUDICE AS AGAINST
NICHOLAS LIAKAS**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff IME WatchDog, Inc. and Defendant Nicholas Liakas, by and through their respective undersigned counsel, that – pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure – Plaintiff’s claims in the above-captioned case shall be dismissed in their entirety with prejudice and without costs or attorneys’ fees as against Defendant Nicholas Liakas.

DATED: April 11, 2023

Respectfully submitted,

/s/ Emanuel Kataev, Esq.

MILMAN LABUDA LAW GROUP PLLC
Emanuel Kataev, Esq.
Counsel for Plaintiff IME WatchDog, Inc.

/s/



CLAYMAN ROSENBERG KIRSHNER & LINDER LLP
James F. Valentino, Esq.
Counsel for Defendant Nicholas Liakas

/s/ Pamela K. Chen

Dated: 4/12/2023

SO ORDERED:

Hon. Pamela K. Chen, U.S.D.J.